

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE

RAJU A.T. DAHLSTROM,

Plaintiff,

v.

UNITED STATES OF AMERICA, et al.,

Defendants.

Case No. 2:16-cv-01874-RSL

STIPULATED MOTION TO  
AMEND INITIAL PLEADINGS  
AND ~~PROPOSED~~ ORDER

**Noted on Motion Calendar:  
July 31, 2017**

**JOINT STIPULATION**

COMES NOW Plaintiff, Raju Dahlstrom, by and through his attorney, Richard L. Pope, defendant, United States of America, by and through its attorney, Tricia Boerger, and all defendants except the United States of America, by and through their attorney, Jack W. Fiander, and stipulate to the filing of Plaintiff's Amended Complaint, a copy of which is attached hereto as Exhibit A. The parties agree that this amendment is done without waiver of any defenses or admission by Defendants of the validity of any of Plaintiff's claims.

STIPULATED MOTION TO  
AMEND INITIAL PLEADINGS  
AND ~~PROPOSED~~ ORDER  
Case No. 2:16-cv-01874-RSL - 1

Richard L. Pope, Jr.  
Lake Hills Legal Services PC  
15600 N.E. 8th Street, Suite B1-358  
Bellevue, Washington 98008  
425-829-5305

1  
2 **SO STIPULATED.**

3 Dated this 31st day of July, 2017.  
4

5 /s/ Richard Pope

6 RICHARD L. POPE, WSBA No. 21118  
7 Lake Hills Legal Services, P.C.  
8 15600 N.E. 8<sup>th</sup> Street, Suite B1-358  
9 Bellevue, Washington 98008  
10 Phone: 425-829-5305  
11 Email: [rp98007@gmail.com](mailto:rp98007@gmail.com)

12 *Attorney for Plaintiff*

13 **SO STIPULATED.**

14 Dated this 31st day of July, 2017.

15 ANNETTE L. HAYES  
16 United States Attorney

17 /s/ Tricia Boerger

18 TRICIA BOERGER, WSBA No. 38581  
19 Assistant United States Attorney  
20 United States Attorney=s Office  
21 700 Stewart Street, Suite 5220  
22 Seattle, Washington 98101-1271  
23 Phone: 206-553-7970  
24 Email: [tricia.boerger@usdoj.gov](mailto:tricia.boerger@usdoj.gov)

*Attorneys for Defendant United States of America*

1  
2  
3 **SO STIPULATED.**

4 Dated this 31st day of July, 2017.

5 s/ Jack W. Fiander

6 JACK W. FIANDER, WSBA No. 13116

7 5808A Summitview Avenue #97

8 Yakima, WA 98908

9 Phone: (509) 961-0096

10 Fax: (509) 969-4436

11 Email: towntnuklaw@msn.com


12 *Attorney for All Defendants*

13 *Except the United States of America*

**ORDER**

The Court, having reviewed the pleadings and record in this matter and the parties having stipulated and agreed to the proposed Amended Complaint, it is hereby **ORDERED** that Plaintiff shall be allowed to file an Amended Complaint in the form attached as Exhibit A to the stipulated motion. Plaintiff shall file the Amended Complaint within 14 days of the date of this Order.

Dated this 3<sup>rd</sup> day of Aug., 2017.

  
Robert S. Lasnik  
United States District Court Judge